

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

ESTATE OF AARON D. STANTON, ) Case No. 3:23-cv-01767-AN  
BY DOUGLAS STANTON, PERSONAL )  
REPRESENTATIVE; AND A.S., A )  
MINOR, BY AND THROUGH HER )  
GUARDIAN AD LITEM, DOUGLAS )  
STANTON, )  
Plaintiffs, )  
vs. )  
JOSHUA DYK and CITY OF )  
PORTLAND, )  
Defendants. )

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VIDEOTAPED DEPOSITION OF  
KAREN STANTON

Taken on behalf of Defendants  
\* \* \*

BE IT REMEMBERED THAT, pursuant to the  
Federal Rules of Civil Procedure, the deposition  
of KAREN STANTON was taken before KIM NERHEIM,  
a Certified Shorthand Reporter for Oregon  
and Certified Court Reporter for Washington,  
on Tuesday, November 12, 2024, commencing at the  
hour of 1:00 p.m., at the offices of Albies,  
Stark & Guerriero, 1500 S.W. 1st Avenue, Suite 1000,  
Portland, Oregon.

## 1 APPEARANCES:

2  
3 ALBIES, STARK & GUERRIERO  
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19 Attorneys for Defendants.

20  
21 ALSO PRESENT: Douglas Stanton  
22 Eric Montross, Videographer

23 \* \* \*

1 he died.

2 Q So did anyone tell you that Aaron was firing a gun?

3 A They did say that. There was -- yeah, there was  
4 gunfire.

5 Q Did anyone tell you where he was firing the gun?

16:09:34

6 A No.

7 Q Do you have any idea what he was aiming at when he  
8 was firing the gun?

9 A Up in the sky.

10 Q Did anyone ever tell you that he pointed a gun at  
11 police officers?

16:09:46

12 A Never.

13 Q And so, as you sit here today, your understanding is  
14 that Aaron was shot while he was firing his gun in the  
15 sky?

16:10:00

16 A Yes. With his daughter in tow on the sidelines.

17 Q Did A REDA CTED ever tell you her experience of what  
18 happened that night?

19 A What she did tell me is her dad fell to the -- the  
20 ground and he died -- the cop came and put his arm around  
21 her to pick her up; she heard the gurgle of his last  
22 breath.

16:10:41

23 And then the police officer told her that  
24 he -- that he died of suicide, and she was -- and I told  
25 her, "There's no way, A REDA CTED. Don't you worry, your dad

16:11:21

1 would never leave you." That was the biggest part that I  
2 heard from A REDA CTED.

3 And one other thing she made them tell me, she  
4 said, "I feel bad because I didn't tell them he was my  
5 dad. I told them he was my mom's boyfriend." 16:11:53

6 "You know that you didn't do anything wrong."

7 She feels so -- I know she feel -- she had to  
8 feel. She and Aaron were very close. He loved her.

9 He built her a little playground. He built a  
10 skate park little area around the house. He had a little 16:12:32  
11 bicycle with her helmet all matching up with her bike,  
12 took her training wheels off, she had to show me how good  
13 she could ride.

14 She's such a good kid, it makes it tough to --  
15 it's so much. The girl is smart. She's just a joy to 16:12:52  
16 have around. It's been a tough world for this little one.

17 Due to the actions of what took place, it's  
18 heartbreaking and, I'm sorry, I just can't understand it.  
19 He was just standing there on his own damn deck. It seems  
20 ruthless, cold-blooded. 16:13:21

21 Q When A REDA CTED told you about what the officer said to  
22 her and what she said to an officer, where were you? Do  
23 you remember when that conversation --

24 A At my house. Usually, we'd tuck her into bed, and  
25 she'd tell me stories about things. Little by little, she 16:13:45

1 tells me stuff.

2 Q How long after the shooting was it that you first had  
3 that conversation at your house?

4 A Not too far down when she said it. Like, maybe  
5 within the week. And I'm glad she told me that, so I knew  
6 that that was just wrong. 16:14:02

7 Q How many times would you say you and A REDA CTED have had  
8 conversations about what she experienced that day?

9 A Oh, it's -- there's different times that she brings  
10 up little things. But, she's more just traumatized to the  
11 fact that it all -- her dad's not coming back. 16:14:34

12 She has a lot of friends that have dads, you  
13 know, and they're all playing and always at the park, and  
14 she's like, "You know what, Nana?"

15 And I go, "What?" 16:14:48

16 She goes, "Well, I'm kind of jealous of those  
17 kids."

18 I go, "Why is that?"

19 "Well, they all have their daddies around."

20 And I was like, "Yeah. Well, your dad's up  
21 there in the heavens. He's still watching over you. He's  
22 in your heart, your soul." 16:15:01

23 But this is what she's going to have as her  
24 future, you know, dances with her dad or any of that is  
25 gone. And we're all doing our best. 16:15:18

1 My son, bless his heart, he was doing his best  
2 to come up and be there for her. All of us are trying to  
3 keep her busy and active.

4 Q I need to ask you more about your conversations with

5 A REDA  
CTED

16:15:39

6 When she said to you that an officer came to  
7 get her, is it your understanding that's the officer that  
8 said to her, "Your dad died of suicide"?

9 A Yes.

10 Q And did she use the word "suicide," or is that you  
11 interpreting --

16:16:14

12 A She used the word "suicide."

13 Q And so, is that specifically what the officer said --

14 A Yes.

15 Q -- "Your daddy died of suicide"?

16:16:26

16 A Yes.

17 Q Did A REDA  
DA --

18 A You know, "He died of suicide," not "your daddy,"  
19 because they didn't act like they knew it was her dad.

20 Q Okay. At any point, has A REDA  
CTED told you anything else  
21 that any officer said to her that night?

16:16:41

22 A I haven't probed her to -- to know. So no.

23 Q And I understand --

24 A She was happy because they gave her a Happy Meal.

25 And she actually was happy she got to ride in a police

16:17:00

1 car. And the officer, she said, was -- he had some candy  
2 he gave her.

3 Q Anything else about that night that she's told you,  
4 other than what you've mentioned so far?

5 A Not that I can recollect. 16:17:21

6 Q I understand you haven't probed her, but have you  
7 talked with her and anyone else together about what the  
8 officer said to her that night?

9 A No. She has -- she had a therapist at school that  
10 she's been -- you know, has been -- when she has her 16:17:44  
11 meltdowns, she'll go -- run in there and talk to her  
12 counselor. She's had a few of those. She's had them at  
13 home, where she has a -- you know, just a meltdown and she  
14 wants her dad. So, you know, it's been a tough time for  
15 that little thing. 16:18:12

16 Q Was the therapist at school at the West Linn school?

17 A Yes.

18 Q Do you think that that therapist was able to help  
19 her?

20 A Oh, I think she helped calm her, yes. She was a good 16:18:27  
21 lady. That was a good school.

22 Q Did you have any discussions about whether A REDAC  
23 needed to stay in that school -- TED

24 A Oh, yeah --

25 Q -- to meet with that therapist? 16:18:42

## 1 CERTIFICATE

2 I, Kim Nerheim, an Oregon Certified Shorthand  
3 Reporter and a Washington Certified Court Reporter, hereby  
4 certify that said witness personally appeared before me at  
5 the time and place set forth in the caption hereof; that  
6 at said time and place I reported in stenotype all  
7 testimony adduced and other oral proceedings had in the  
8 foregoing matter; that thereafter my notes were  
9 transcribed through computer-aided transcription, under my  
10 direction; and that the foregoing pages constitute a full,  
11 true and accurate record of all such testimony adduced and  
12 oral proceedings had, and of the whole thereof.

13 I further certify review of the transcript was  
14 requested.

15 Witness my hand at Portland, Oregon, this 25th  
16 day of November, 2024.

17  
18  
19  
20 

21 Kim Nerheim

22 Oregon CSR No. 90-0138

23 Expires 9/30/2026

24 Washington CCR No. 0003038

25 Expires 3/28/2025